

**PATENT**

Atty Docket No.: 10008388-1  
App. Ser. No.: 10/066,096

**REMARKS**

Amendments to independent claims 1, 20, 22, 27 are proposed to clarify the features of a hierarchy of nodes, including subtrees in a hierarchy, a local environment of a node, parent nodes, children nodes, and sibling nodes.

It is respectfully submitted that the Examiner's interpretation of clusters of centroid vectors disclosed in Lazarus et al. as being similar to the claimed nodes do not apply the nodes as recited in the amended claims. For example, Lazarus et al. in col. 24, l. 55 to col. 25, l. 15 provides categorization or clustering of contents in various vector databases to generate "a set of cluster centroid vectors that represent regions of high density." Each of the cluster centroid vectors includes a centroid vector and a cluster of word vectors arranged in a content vector space around the centroid vector such that "the RDA system is able to find a set of word vectors that are closest in the content vector space to the centroid vector." Thus, the clusters would not have relationships with other clusters. Rather, there exists a relationship WITHIN EACH CLUSTER, between the word vectors surrounding the centroid vector and the centroid vector itself. Thus, the clusters in Lazarus et al. cannot be deemed the nodes as claimed. Furthermore, should the word vectors in each cluster be interpreted as nodes in a hierarchy, it is respectfully submitted that such "nodes" do not read on the claimed nodes because of a lack of the claimed relationships regarding children nodes, parent nodes, sibling nodes, subtrees, and local environments.